

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

In re:

Legacy IMBDS, Inc., *et al.*,¹

Debtors.

Synacor, Inc.,

Plaintiff,

v.

IV Media, LLC; Innovation Ventures, LLC; Portal Acquisition Co.; iMedia Brands, Inc.; ValueVision Interactive, Inc.; VVI Fulfillment Center, Inc.; ValueVision Retail Inc.; JWH Acquisition Company; PW Acquisition Company, LLC; EP Properties, LLC; FL Acquisition Company; Norwell Television, LLC; 867 Grand Avenue, LLC; and Unidentified Parties, 1-25,

Defendants.

Chapter 11

Case No. 23-10852 (KBO)

(Jointly Administered)

Adv. Proc. No. 23-50753 (KBO)

**CERTIFICATION OF COUNSEL
REGARDING STIPULATION AND PROPOSED ORDER
EXTENDING TIME FOR FILING AN ANSWER OR RESPONSE TO COMPLAINT**

The undersigned counsel to Debtor Defendants, Legacy IMBDS, Inc. (f/k/a iMedia Brands, Inc.), Portal Acquisition Company, ValueVision Interactive, Inc., VVI Fulfillment Center, Inc., ValueVision Retail, Inc., JWH Acquisition Company, PW Acquisition Company,

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number are: ValueVision Media Acquisitions, Inc. (8670); Legacy IMBDS, Inc. (3770); ValueVision Interactive, Inc. (8730); Portal Acquisition Company (3403); VVI Fulfillment Center, Inc. (5552); ValueVision Retail Inc. (2155); JWH Acquisition Company (3109); PW Acquisition Company, LLC (0154); EP Properties, LLC (3951); FL Acquisition Company (3026); Norwell Television, LLC (6011); and 867 Grand Avenue, LLC (2642). The Debtors' service address is 6740 Shady Oak Road, Eden Prairie, MN 55344-3433.

LLC, EP Properties, LLC, FL Acquisition Company, Norwell Television, LLC, and 867 Grand Avenue, LLC (collectively, the “Debtor Defendants”) hereby certifies as follows:

The above-captioned plaintiff (the “Plaintiff”) and the Debtor Defendants have agreed, subject to this Court’s approval, to extend the Debtor Defendants’ time to answer or respond to the Plaintiff’s complaint against the Debtor Defendants. Attached as **Exhibit A** is a proposed form of order approving the stipulation. The stipulation is attached as **Exhibit 1** to the proposed form of order.

[Remainder of Page Intentionally Left Blank]

WHEREFORE the Debtor Defendants and the Plaintiff request that this Court enter the proposed form of order.

Dated: January 4, 2024
Wilmington, Delaware

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